

ENSURING DISTRICT COMPLIANCE WITH HEALTHY FOOD CERTIFICATION

School districts that choose to implement the healthy food option of Healthy Food Certification (HFC) under [Section 10-215f](#) of the Connecticut General Statutes (C.G.S.) must ensure that **all** foods sold to students **separately** from reimbursable meals comply with the Connecticut Nutrition Standards (CNS). This includes all purchased and school-made foods sold in the cafeteria, school stores, vending machines, fundraisers and any other sources of food sales to students. The four strategies below assist districts with HFC compliance.

1

Verify that all foods comply with the CNS before offering them for sale to students.

Purchased Items: Allowable items are included on the Connecticut State Department of Education's (CSDE) [List of Acceptable Foods and Beverages](#), a brand-specific list of foods that comply with the CNS and beverages that that comply with the state beverage statute (C.G.S. [Section 10-221q](#)). If a product is not listed, the district must determine compliance with the CNS before selling the product to students. The worksheets on the CSDE's [Evaluating Foods for Compliance](#) Web Page assist schools with determining product compliance. Districts can submit product information to the CSDE for review and acceptable products will be added to the online list. For more information, see [Submitting Food and Beverage Products for Approval](#).

The CSDE strongly recommends using the *List of Acceptable Foods and Beverages* to determine which commercial food and beverages may be sold, instead of evaluating items locally. This helps to ensure HFC compliance.

School-made Foods: Before school-made foods can be sold to students separately from reimbursable meals, the district is responsible for conducting a **nutrient analysis** of recipes to determine compliance with the CNS. School-made foods include all items that:

- are prepared from scratch using a recipe, such as entrees sold only a la carte, soups, baked goods, cooked grains and vegetables; or
- that require some additional processing by adding other ingredients after purchasing, such as popping popcorn kernels with oil or making cookies from a mix and adding butter and eggs.

The CSDE's handout, [Guidance on Evaluating School Recipes for Compliance](#), provides information on evaluating recipes.

2

Provide information and training to ensure that all groups selling foods understand the HFC requirements and have reviewed all foods for CNS compliance before offering them for sale to students.

Ongoing communication is critical to the district's successful implementation of HFC. People to inform include, but are not limited to:

- school principals and other administrators;
- school food service program staff, e.g., school food service director and cafeteria managers;
- culinary arts program staff (if foods are sold), e.g., coordinators and teachers;
- athletic directors;
- family and consumer sciences teachers (if foods are sold);
- advisors and coordinators for school stores, kiosks and school-based enterprises;
- parent groups, school organizations and individuals who coordinate fundraising activities;
- vending machine operators; and
- other individuals or organizations responsible for coordinating any other food sales to students in the district.

ENSURING HFC COMPLIANCE, continued

3

Decide how to document and monitor compliance *before* beginning HFC implementation.

Districts should develop local procedures for monitoring HFC compliance in all schools. The designated district contact person and other appropriate school staff play a key role in this process, and must be supported by the administration. Before the school year begins, the district should:

- identify what foods can be sold to students from all sources at school;
- communicate information regarding allowable foods to all groups selling to students;
- develop a system to review and monitor compliance of food sales in all schools; and
- develop a system to track fundraising events that do not meet the exemption criteria. For more information, see *Fundraising with Foods and Beverages* and the CSDE's [sample fundraiser form](#).

4

Maintain documentation to demonstrate compliance with the CNS.

Before the school year begins, the district should determine the methods and forms that will be used to document HFC compliance. Examples of documentation include a locally developed database or list of acceptable foods and beverages, an inventory of items sold in district vending machines and school stores, a school log system to identify acceptable fundraising events, a description of the process used to ensure that all food items comply with the CNS, and a handout or memo communicating district procedures for evaluating HFC compliance at the school level.

The CSDE annual documentation materials are available on the CSDE's [HFC Documentation](#) Web Page. All districts must submit the online *Healthy Food Certification Compliance Form* by November 30 of each year. Select districts must also submit lists of foods and beverages sold to students from all sources (see *Districts Required to Submit Food and Beverage Lists*). The simplest method of documenting compliance is to print the appropriate sections of the CSDE's *List of Acceptable Foods and Beverages* and highlight all of the items sold in the district. For more information on the documentation requirements, see *Guidance for Documenting Compliance with Healthy Food Certification*.

Resources

- CNS Web Page: www.sde.ct.gov/sde/cwp/view.asp?a=2678&q=322422
- Evaluating Foods for Compliance Web Page: www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=322430
- *Guide to Competitive Foods in Schools*: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/cf/cfg.pdf
- HFC Documentation Web Page: www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=322428
- HFC Web Page: www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=322420
- List of Acceptable Foods and Beverages: www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=322432
- *Responsibilities of HFC District Contact Person*: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/hfc/dcresp.pdf



For more information, visit the CSDE's [HFC](#) and [CNS](#) Web pages or contact: Susan S. Fiore, MS, RD, Nutrition Education Coordinator, Connecticut State Department of Education, Bureau of Health/Nutrition, Family Services and Adult Education, 25 Industrial Park Road, Middletown, CT 06457, 860-807-2075, susan.fiore@ct.gov.

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